

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

YOUNG CONSERVATIVES OF TEXAS §
FOUNDATION §

Plaintiff,

v.

THE UNIVERSITY OF NORTH TEXAS, THE §
UNIVERSITY OF NORTH TEXAS §
SYSTEM, NEAL SMATRESK, PRESIDENT §
OF THE UNIVERSITY OF NORTH §
TEXAS and SHANNON GOODMAN, §
VICE PRESIDENT FOR ENROLLMENT OF §
THE UNIVERSITY OF NORTH TEXAS; §

Defendants.

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§ CIVIL ACTION NO. 4:20-CV-973

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§ JUDGE SEAN D. JORDAN
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DECLARATION OF WILLIAM C. DOMINGUEZ

I, William C. Dominguez, hereby declare as follows:

1. I am over the age of 18, of sound mind, and capable of making this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

2. I am the State Chairman of Young Conservatives of Texas ("YCT"), a non-partisan youth organization committed to advancing conservative values.

3. In my role as State Chairman, I oversee all YCT chapters at colleges and universities across the state of Texas.

4. YCT has established and currently maintains a chapter at the University of North Texas ("UNT") in Denton County, Texas.

5. YCT's members include United States citizens that do not qualify as Texas residents and are not otherwise exempt from the requirement to pay nonresident tuition.

6. YCT's members include individuals that are currently enrolled as undergraduate students at UNT.

7. YCT's core organizational purpose is to advance conservative values by educating students and the public, advocating for conservative policies, engaging in campus activism, and publishing ratings of the Texas Legislature.

8. Pursuant to this core purpose, YCT has repeatedly taken stands on issues of higher education. Advocacy for higher education reform is central to YCT's role as Texas's preeminent conservative youth organization. YCT not only advocates for such reforms statewide, but also focuses in on campus specific policies, including those at UNT. *See* Exhibit A.

9. For example, YCT advocates for increased competition, transparency, and accountability in higher education. *See* Exhibits B, C, and D.

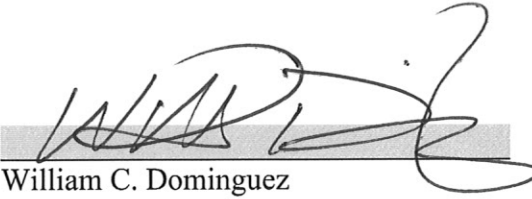
10. YCT has also fought hard to eliminate wasteful spending as a means of lowering tuition. *See* Exhibits E and F.

11. YCT has consistently mounted a conservative opposition to tuition deregulation. *See* Exhibits G and H.

12. And, most relevantly, YCT has repeatedly opposed the disparate treatment of aliens who are not lawfully present in the United States and United States citizens from other states with regard to tuition. *See* Exhibits I, J, K, and L.

13. The denial of resident tuition rates to United States citizens has impaired YCT's ability to advance conservative values by causing the organization to expend scarce resources that would otherwise be dedicated to advocacy in other policy areas.

Pursuant to 28 U.S.C. § 1746, I, William C. Dominguez, declare under penalty of perjury that the foregoing is true and correct. Executed on this 5 day of January, 2021, in DALLAS, Texas.



William C. Dominguez